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| 1 2 | JONATHAN B. PAUL (SBN 215884) CHRISTOPHER L. JANOF (SBN 335242) | | |
|-------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------------|--|
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| 4 | cjanof@rhplawyers.com | | |
| 5 | jpaul@rhplawyers.com | | |
| 67 | Attorneys for Defendant COUNTY OF SACRAMENTO | | |
| 8 | UNITED STATES DISTRICT COURT | | |
| 9 | EASTERN DISTRICT OF CALIFORNIA | | |
| 10 | | | |
| 11 | JOSEPH HENAO, ANGELA HENAO, | Case No. 2:22-cv-00352-MCE-KJN | |
| 12 | Plaintiffs, | STIPULATION and ORDER | |
| 13 | VS. | FOR AN EXTENSION OF TIME TO FILE A RESPONSIVE | |
| 14 | COUNTY OF SACRAMENTO, JENNIFER RODRIGUEZ, SELEENA | PLEADING | |
| 15 16 | ULAHANNAN, [FNU] WILLIAMS, [FNU] NICKERSON, and DOES 1 through 10, inclusive, | [E.D. Cal. L.R. 144(a)] | |
| | Defendants. | | |
| 17 | | | |
| 18 | Plaintiffs by and through their counsel | Robert R. Powell Esa, of Powell & Associates | |
| 19 | Plaintiffs, by and through their counsel Robert R. Powell, Esq., of Powell & Associates | | |
| 20 | and Samuel H. Park, Esq., Attorney at Law, and Defendant County of Sacramento, by and through | | |
| 21 | counsel Jonathan B. Paul, Esq., and Christopher L. Janof, Esq., of the Rivera Hewitt Paul LLP | | |
| 22 | hereby stipulate pursuant to Local Rule of Court 144(a) to an extension of time in order to permi | | |
| 23 | Defendant to file a responsive pleading to plaintiffs' Complaint for Violation of Civil Rights (EC) | | |
| 24 | No. 1) filed on February 23, 2022, in accordance with the pleading requirements of the Federa | | |
| 25 | Rules of Civil Procedure. The parties stipulate and have agreed to extend the responsive pleading | | |
| 26 | deadline follows: | | |
| 77 | (1) Defendant County of Sacramento w | as served with this lawsuit on or about April 1 | |

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2022.

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| | II | | |
|---------------------------------|--------------------------------------------------------------------------------------------|--------------------------------------------------|--|
| 1 | (2) The undersigned defense counsel was contacted by the claims administrator for the | | |
| 2 | County of Sacramento on May 9, 2022, regarding possible representation of Defendant | | |
| 3 | After conducting a conflict check, defense counsel accepted the assignment, but to date i | | |
| 4 | still awaiting case-related materials from the Sacramento County Sheriff's Department and | | |
| 5 | the Department of Child, Family and Adult Services. Additionally, defense counsel is | | |
| 6 | attempting to confirm that the individually named defendants are employed by the Count | | |
| 7 | of Sacramento and will be inquiring of those individuals if the undersigned has their | | |
| 8 | authority to accept service of process. | | |
| 9 | (3) Under these circumstances, the parties have agreed and hereby stipulate to extend the | | |
| 10 | time for Defendants COUNTY OF SACRAMENTO, et al. to respond to the Complain | | |
| 11 | (ECF No. 1) from the original responsive pleading due date of April 22, 2022, to the agree | | |
| 12 | upon date of May 23, 2022. | | |
| 13 | IT IS SO STIPULATED. | | |
| 14 | DATED: May 13, 2022 | POWELL & ASSOCIATES | |
| 1516 | | /s/Robert R. Powell (As Authorized on 5/13/2022) | |
| 17 | | ROBERT R. POWELL Attorneys for Plaintiffs | |
| 18 19 | DATED: May 13, 2022 | ATTORNEY AT LAW | |
| 20 | | /s/ Samuel H. Park (As Authorized on 5/13/2022) | |
| 21 | | SAMUEL H. PARK | |
| 22 | | Attorneys for Plaintiffs | |
| 23 | | | |
| 24 | DATED: May 13, 2022 | RIVERA HEWITT PAUL LLP | |
| 25 | | /s/ Jonathan B. Paul | |
| 26 | | JONATHAN B. PAUL CHRISTOPHER L. JANOF | |
| 27 | | Attorneys for Defendant COUNTY OF SACRAMENTO | |
| 28 | | | |

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| 1 | <u>ORDER</u> | |
|----|-----------------------------------------------------------------------------------------------|--|
| 2 | GOOD CAUSE having been shown, the foregoing stipulated request for an extension of | |
| 3 | time for Defendant COUNTY OF SACRAMENTO to file a responsive pleading to Plaintiffs' | |
| 4 | Complaint (ECF No. 1) is HEREBY GRANTED. Defendant COUNTY OF SACRAMENTO shall | |
| 5 | file and serve their responsive pleading to plaintiffs' Complaint no later than May 23, 2022. | |
| 6 | IT IS SO ORDERED. | |
| 7 | Dated: May 24, 2022 | |
| 8 | Moun / L. | |
| 9 | MORRISON C. ENGLAND, JR SENIOR UNITED STATES DISTRICT JUDGE | |
| 10 | SEMION OMITED STATES DISTRICT VODGE | |
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